

Robert G. Drummond
Chapter 13 Standing Trustee
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(Trustee)

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MONTANA

In re)	
)	No. 16-61183-13
MATTHEW SCOTT RAGAN,)	
)	
Debtor.)	

**MOTION FOR ORDER COMPELLING DEBTOR
TO TURNOVER 341 DOCUMENTS**

The Chapter 13 Standing Trustee, pursuant to 11 U.S.C. § 521(a)(4) and F.R.B.P. 4002, moves the Court for an order compelling the Debtor, within ten (10) days, to turnover the following documents to the Trustee:

1. Complete copies of 2014 and 2015 State and Federal tax returns.
2. Copies of Pay advices for the six months prior to filing, 401(k) documents, and retirement plan documents.
3. Copies of all Bank statements for the six months prior to filing.
4. Copies of any vehicle titles, Kelley Blue Book values, and any loan documents concerning your vehicle(s).
5. Copies of Declaration of Homestead, Deed of Trust, and any loan documents concerning your residence.

WHEREFORE the Trustee prays:

1. For an order compelling turnover of the above-referenced documents within ten (10) days.
2. For such other and further relief as the Court deems appropriate.

DATED December 12, 2016.

Chapter 13 Standing Trustee
P. O. Box 1829
Great Falls, Montana 59403-1829

By /s/ Robert G. Drummond
Trustee

**NOTICE OF OPPORTUNITY TO RESPOND
AND REQUEST A HEARING**

If you object to the motion, you must file a written responsive pleading and request a hearing within fourteen (14) days of the date of the motion. The responding party shall schedule the hearing on the motion at least twenty-one (21) days after the date of the response and request for hearing and shall include in the caption of the responsive pleading in bold and conspicuous print the date, time and location of the hearing by inserting in the caption the following:

NOTICE OF HEARING

Date: _____
Time: _____
Location: _____

If no objections are timely filed, the Court may grant the relief requested as a failure to respond by any entity shall be deemed an admission that the relief requested should be granted.

DATED December 12, 2016.

Chapter 13 Standing Trustee
P. O. Box 1829
Great Falls, Montana 59403-1829

By /s/ Robert G. Drummond
Trustee

CERTIFICATE OF MAILING

I, the undersigned, do hereby certify under penalty of perjury that a copy of the within and foregoing **MOTION FOR ORDER COMPELLING DEBTOR TO TURNOVER 341 DOCUMENTS** was mailed on December 12, 2016, at Great Falls, Montana, and directed to the following:

Matthew S. Ragan
33 Wild Goose lane
Kalispell, MT 59901

/s/ Tiffany Floerchinger
Tiffany Floerchinger